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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
GLORY WEALTH SHIPPING SERVICES LTD., :
: :
Plaintiff, : :
: : 08 Civ. 1102(VM)
- against - : :
: : **NOTICE OF MOTION**
FIVE OCEAN CORPORATION LTD., :
: :
Defendant. : :
-----X

PLEASE TAKE NOTICE that on the annexed memorandum of law and affidavit of Armand M. Paré, Jr. and attachments thereto and all pleadings and proceedings had herein, Defendant will move this Court on March 7, 2008 at 10:30 a.m. at 500 Pearl Street in courtroom 20B for an order, in the alternative, in accordance with either Admiralty Supplemental Rules E(4)(f), E(7) and E(6): (1) that Plaintiff promptly provide cash security to secure Defendant's counterclaims in an amount set by the Court failing which Plaintiff's attachment be vacated and its suit dismissed; (2) that Plaintiff's attachments be vacated or reduced or discovery ordered on an abbreviated schedule concerning the amount of Plaintiff's attachments; (3) that Plaintiff be barred from effecting any further attachments against Defendant's property after its filing of a

General Appearance and Answer on February 28, 2008 and (4) for any other and further relief which may be just and equitable.

Answering papers are due on March 5, 2008.

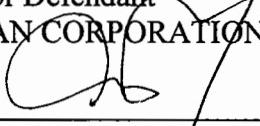
No prior request for this relief has been made.

Dated: New York, New York
February 28, 2008

Yours, etc.

NOURSE & BOWLES, LLP
Attorneys for Defendant
FIVE OCEAN CORPORATION LTD.

By: _____


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